

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC. <div style="text-align: right;">Plaintiff,</div> <div style="text-align: center;">v.</div> SAP AMERICA, INC., et al. <div style="text-align: right;">Defendants.</div>))))))))))	CASE NO. 1:08 CV 2755 JUDGE WELLS
--	--	--

OBJECTIONS OF SAP AMERICA, INC. AND SAP AG TO PLAINTIFF’S WITNESS LIST

Defendants SAP America, Inc. and SAP AG (collectively, “SAP”), by and through undersigned counsel and pursuant to the Court’s Trial Order filed May 1, 2014 [ECF No. 193], hereby object to the following witnesses listed on Plaintiff Hodell-Natco Industries, Inc.’s list of witnesses it expects to call to testify at the trial of this matter set for November 17, 2014:

- **“Jaime Clark.”** SAP objects to this testimony for the reasons set forth in SAP’s Motion *in Limine* No. 2.
- **Udi Ziv.** SAP objects to this testimony for the reasons set forth in SAP’s Motion *in Limine* No. 5.
- **Dr. G. William Kennedy.** SAP objects to this testimony for the reasons set forth in SAP’s Motion in Limine to Preclude the Expert Testimony and Opinions of G. William Kennedy. *See* Doc. Nos. 176, 181, 199, 203.
- **SAP custodian of records.** SAP objects to this testimony. Hodell has not identified a specific person or a basis for why this testimony might be necessary.
- **Damon Hacker.** SAP specifically reserves the right to object to this testimony.

SAP reserves its right to object to additional witnesses and/or testimony and to amend this list of objections in the future as may become necessary.

Respectfully submitted,

/s/ Gregory J. Star

Michael J. Miller (admitted *pro hac vice*)

Gregory J. Star (admitted *pro hac vice*)

Drinker Biddle & Reath LLP

One Logan Square, Suite 2000

Philadelphia, PA 19103-6996

Telephone: (215) 988-2700

Facsimile: (215) 988-2757

Attorneys for SAP America, Inc. and SAP AG

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of October, 2014, a copy of the foregoing SAP America, Inc.'s and SAP AG's Objections to Plaintiff's Witness List was filed electronically and that a copy has been sent via electronic mail to Hodell-Natco Industries, Inc. pursuant to Fed. R. Civ. P. 5(b)(2)(E) and via First Class Mail to the following pursuant to Fed. R. Civ. P. 5(b)(2)(F):

LSI-Lowery Systems, Inc.
c/o Timothy K. Kellett
911 Washington Ave., Suite 400
St. Louis, MO 63101

IBIS Group, Inc
c/o John T. Grobe
1749 Naperville Road, Suite 203
Wheaton, IL 60187

/s/ Gregory J. Star
Gregory J. Star (admitted *pro hac vice*)